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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

STEVE CORDOVA and HUYEN PHUONG
LE, on behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

NORMAN INDUSTRIAL MATERIALS,
INC., a California Corporation; and DOES 1-
50, inclusive.

Defendants.

Case No.: 23STCV17785

Related to Case No.: 23STCV19388

*[Assigned for all purposes to the Hon.
Kenneth R. Freeman, Dept. SSC-14]*

**DECLARATION OF MEHRDAD
BOKHOUR IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS AND PAGA ACTION
SETTLEMENT**

Date: May 13, 2025

Time: 10:00 a.m.

Dept.: SSC-14

Action Filed: July 27, 2023

Trial Date: None Set

1 counsel in at least twenty more.

2 7. I have been recognized as a “Super Lawyer Rising Star” in Employment Litigation
3 from 2017 through 2021, and as a “Super Lawyer” in 2022 and 2023, an honor awarded to no more
4 than 2.5% of attorneys in the practice area. I have also been recognized by TopVerdicts.com for
5 securing several of the top settlements in wage-and-hour class and PAGA actions in California.

6 8. My office has played a meaningful role in investigating, prosecuting, and resolving
7 this case. We conducted substantial factual and legal analysis and participated in meaningful
8 informal discovery and information exchange with Defense counsel. These efforts culminated in a
9 successful mediation facilitated by experienced mediator Steve Mehta, Esq., resulting in the
10 proposed class-wide Settlement.

11 9. In light of the risks inherent in continued litigation—including contested factual and
12 legal issues—Plaintiffs’ counsel believes the Settlement is fair, reasonable, and adequate. The
13 resolution was reached through arm’s-length negotiations between experienced counsel after an
14 informed exchange of relevant documents and data.

15 10. The Settlement was reached through adversarial yet professional negotiations,
16 facilitated by an experienced mediator with expertise in wage-and-hour class actions. The result
17 reflects significant effort and advocacy by both sides.

18 11. While Plaintiffs and their counsel were confident in the strength of the claims and the
19 ability to achieve class certification, they also recognized the risks, costs, and potential delays of
20 ongoing litigation, including the possibility of adverse rulings at certification, summary judgment,
21 trial, or on appeal.

22 12. The Settlement provides fair and proportionate payments to each Class Member based
23 on the number of Compensable Workweeks worked during the Class Period. Plaintiffs’ counsel
24 conducted thorough investigation and analysis with the aim of maximizing recovery while avoiding
25 the expense and delay of protracted litigation. In our judgment, the Settlement is in the best interests
26 of the Class.

27 13. Plaintiffs’ counsel performed extensive informal discovery, including review and
28 analysis of Defendant’s policies, payroll and time records, personnel documents, and wage

1 statements. We also engaged in sampling and extrapolation of class-wide data to assess damages and
2 evaluate the strength of the claims.

3 14. Based on our collective experience in wage-and-hour class and PAGA litigation,
4 Joshua S. Falakassa and I believe the proposed Settlement is fair, reasonable, and adequate. It
5 provides meaningful compensation to the Class while avoiding the risks and delays of continued
6 litigation.

7 15. Plaintiffs' counsel and Defense counsel fully support the terms of the Settlement, as
8 set forth in the Settlement Agreement.

9 16. The Settlement represents a compromise that accounts for the legal and factual risks
10 associated with class certification, liability, and damages. Importantly, the Settlement provides for
11 non-reversionary payments to the Class.

12 17. For these reasons, Plaintiffs respectfully request that the Court grant preliminary
13 approval of the Settlement as fair, reasonable, and in the best interests of the Class. Plaintiffs also
14 request that the Court preliminarily approve the requested attorneys' fees, litigation costs, and service
15 awards to the Class Representatives.

16 18. The proposed Notice Packet and mailing plan comply with California Rules of Court
17 3.769(f) and 3.766(b). The Notice Packet includes: (1) the material terms of the Settlement; (2) the
18 requested attorneys' fees, costs, and Settlement Administration Costs; (3) information about the final
19 fairness hearing, the opt-out and objection process; and (4) instructions on how to obtain additional
20 information.

21 19. All Plaintiffs and Plaintiffs' counsel entered into a joint prosecution agreement that
22 complies with the California Rules of Professional Conduct, including Rule 1.5.1, as well as
23 California Rules of Court, Rule 3.769(b), which governs applications for class action settlements.
24 The joint prosecution agreement ensures coordinated representation, facilitates the efficient
25 prosecution of the litigation, and avoids conflicts of interest, all in the best interest of the Class.

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1 I declare under penalty of perjury under the laws of the state of California that the foregoing
2 is true and correct on this 2nd day of April 2025, in Los Angeles, California.

3 By: /s/ Mehrdad Bokhour
4 Mehrdad Bokhour, Esq.
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